IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA **ALEXANDRIA DIVISION**

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Plaintiff,

Civil Action No. 1:17cv1240 v.

ANDREWS FEDERAL CREDIT UNION ("Andrews FCU"),

Defendant.

JOINT MOTION TO DISMISS COMPLAINT

NOW COMES Plaintiff Keith Carroll ("Plaintiff") and Defendant Andrews Federal Credit Union ("Defendant"), (collectively, the "Parties") and respectfully move this Court to dismiss Plaintiff's Complaint with prejudice.

WHEREFORE, the Parties respectfully request that this Court enter an Order dismissing Plaintiff's Complaint against Defendant with prejudice.

Respectfully submitted,

Dated: December 19, 2017

Andrews Federal Credit Union

By: ____/s/ Thomas M. Lucas (VSB No. 27274) Kristina H. Vaquera, Esq. (VSB No. 43655) Jackson Lewis, PC 500 E. Main Street, Suite 800 Norfolk, Virginia 23510 Telephone: (757) 648-1424

Facsimile: (757) 648-1418

tom.lucas@jacksonlewis.com E-mail: Counsel for Andrews Federal Credit Union

Keith Carroll

By: /s/ Thomas E. Strelka

Thomas E. Strelka (VSB No. 75488) L. Leigh R. Strelka (VSB No. 73355) 119 Norfolk Avenue, SW Warehouse Row, Suite 330 Roanoke, VA 24011 (504) 283-0802

Email: thomas@strelkalaw.com
Email: leigh@strelkalaw.com
Counsel for Plaintiff

*signed by Thomas M. Lucas with permission of Thomas E. Strelka

CERTIFICATE OF SERVICE

I hereby certify that on the 19th day of December, 2017, I will electronically file the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing (NEF) to the following:

Thomas E. Strelka, Esq. L. Leigh R. Strelka, Esq. STRELKA LAW OFFICE, P.C. 119 Norfolk Avenue, SW, Warehouse Row, Suite 330 Roanoke, Virginia 24011

Scott J. Ferrell, Esq. Victoria Knowles, Esq. Pacific Trial Attorneys 4100 Newport Place, Suite 800 Newport Beach, California 92660

By: ____/s/
Thomas M. Lucas (VSB No. 27274)
Kristina H. Vaquera, Esq. (VSB No. 43655)
Jackson Lewis, PC
500 E. Main Street, Suite 800
Norfolk, Virginia 23510
Telephone: (757) 648, 1424

Telephone: (757) 648-1424 Facsimile: (757) 648-1418

E-mail: <u>tom.lucas@jacksonlewis.com</u> Counsel for Andrews Federal Credit Union